

UNITED STATES DISTRICT COURT P W 09
DISTRICT OF MASSACHUSETTS
BOSTON MASS.

PHILLIP A. DAVIDSON PRO SE
42 BECKFORD ST. APT.#4
BEVERLY MASS. 01915

v.

MAY 25, 2002

02-10964WGY

STATE OF TEXAS ATTNY. GEN.
CHILD SUPPORT DIV.
P.O.BOX 12017
AUSTIN TX. 78711-2017

CSE CHILD SUPPORT CO
P.O.BOX 49459
AUSTIN TX. 78765

JOANNE RABOT ADDRESS UNKNOWN
c/o ATTNY. SUSAN HUBBARD
430 BOSTON ST. SUITE 105
TOPSFIELD MASS. 01983

ATTNY. SUSAN HUBBARD
430 BOSTON ST. SUITE 105
TOPSFIELD MASS. 01983

ATTNY. ERICA FOSTER
10 ELM ST.
DANVERS MASS. 01923

PROBATE # 39433
AMOUNT \$ 150
SUMMONS ISS. yes-s
LOCAL RULE 4.1
WAIVER OF SERV.
NOT EXCUSED
AO LNS CR 121
BY DEPUTY CLX SS
DATE 5-28-02

COMPLAINT

THIS CASE ARISES BY THE FACTUAL ACCOUNTS AS DESCRIBED ON THE
FOLLOWING PAGES STARTING WITH PAGE #1.

PARTIES

THE PLAINTIFF IS A RESIDENT OF BEVERLY MASS. COUNTY OF ESSEX,
AND A CITIZEN OF THE UNITED STATES.

DOCKETED



(CONT. FROM COMPLAINT PAGE)

THE DEFENDENTS ARE CITIZENS OF BOTH THE STATE OF TEXAS, AND THE STATE OF MASSACHUSETTS, AND CITIZENS OF THE UNITED STATES.

THIS COURT HAS JURISDICTION OVER THIS CASE PURSUENT TO 28 U.S.C. 1331, AND USEING THE U.S. MAIL FOR FRAUD, AND EXTORTION.

FACTS

SEE PAGE #1 TO FOLLOW.

THE PLAINTIFF DEMANDS JUDGEMENT AGAINST THE DEFENDENTS FOR PUNITIVE DAMAGES, AND SUCH RELIEF AS THE COURT DEEMS JUST.



PHILLIP A. DAVIDSON PRO SE
42 BECKFORD ST. APT. #4
BEVERLY MASS. 01915
TEL. 978-869-4228

THIS CASE BEGINS ON OCTOBER 2, 2001 WHEN A AGREEMENT WAS COMPLEATED BY THE PLAINTIFF PHILLIP A. DAVIDSON, AND DEFENDENT JOANNE RABOT IN WHICH THE PLAINTIFF WAS TO SIGN AWAY HIS RIGHTS AS THE FATHER OF A CHILD BORN TO THE PARTIES,(SEE EXHIBITS #1 THRU #5).

SHORTLY AFTER THE AGREEMENT WAS SIGNED BY ALL THE PARTIES AND JUDGE EDWARD ROCKET THE DEFENDENT WAS LEAGELY FREE TO TAKE THE CHILD TO TEXAS, ON, OR ABOUT JANUARY 2002 THE DEMANDS STARTED TO ARRIAVE AT THE PLAINTIFFS HOME DEMANDING \$22,700 DOLLERS IN CHILD SUPPORT PAYMENTS MAILED TO THE TEXAS ADDRESS IN (EXHIBIT #6)

THE PLAINTIFF WROTELETTERS, SENT COPY'S OF THE AGREEMENT TO THE CHILD ENFORCEMENT UNIT, CALLED BY TELEAPHONE TO THAT SAME CHILD SUPPORT UNIT, A BILL COLLECTOR LICENSED BY THE STATE OF TEXAS ATTORNEY GENERALS OFFICE, AND THE TEXAS DEPT. OF BANKING WHICH ARE TOTALY RESPONSIABLE FOR THE ACTIONS OF IT'S SUB-CONTRACTORS.

I FURTHER WROTE TO MY ATTORNEY ERICA FOSTER OF 10 ELM ST. DANVERS MASS. 01923 TO STOP THIS HARASSMENT OF ABOUT 10 TELA-PHONE CALLS, AND AT LEAST 7 DEMANDS BY MAIL SIMULAR TO EXHIBIT #6, ON MAY 6, 2002 I WROTE TO BOTH LAWYERS WITH A DEMAND TO PUT A STOP TO THIS HARASSMENT BY MAY 22, 2002 OR I WOULD FILE A COURT ACTION SHORTLY AFTER THAT DATE(EXHIBITS #9, AND #10).

THE PLAINTIFF SEEKS RELIEF FROM THIS HONORABLE COURT FROM THE FRAUDULENT, AND EXTORTIONATE ATTEMPT BY THE TEXAS CHILD SUPPORT ENFORCEMENT AGENCY, AND IT'S PRIVATE BILL COLLECTOR UNDER THE FOLLOWING STATUTES:, FRAUD--310F-2nd-262-267,---234 SUPP. 201203, 38 CAL. RPTR. 148,157,(NO SCIENTER)---144A,2nd, 836-838,---255 NYS, 2nd, 608-610, EXTORTION, MODEL PENAL CODE 223.4, 148A,2nd 848-850, 2 MASS. 522,523,--160 F, 2nd, 754,756,--BLACKMAIL, 258 NW, 62,65, ---82NE, 1039,1041.AGAINST THE TWO ATTORNEY'S ERICA FOSTER, AND SUSAN HUBBARD, NONFEASANCE 191NE2nd,588,591.

THE DEFENDENT FURTHER PORTRAYED ITSELF AS A BONIFIED ENITY OF THE TEXAS CHILD SUPPORT DIVISION OF THAT STATES ATTORNEY GENERALS OFFICE, DECIEVEING THE PLAINTIFF INTO BELIEVEING THAT THE DEMANDS WERE IN FACT OF THE TEXAS STATE CHILD SUPPORT AGENCY AND I DID NOT UNDERSTAND THAT THIS CHILD SUPPORT ENFORCEMENT GROUP WAS IN FACT A BILL COLLECTOR AND HAD NO LEGAL STANDING IN THE ENTIRE MATTER, BUT THE BONIFIED TEXAS CHILD SUPPORT AGENCY OF THE STATE OF TEXAS IS AS GUILTY OF THESE FELONY'S AGAINST ME AS THE SHAM BILL COLLECTOR, A CO-CONSPERITOR.

THE PLAINTIFF ALSO CHARGES THAT NO COLLECTION, ATTEMPT THEREOF COULD BE POSSIABLE WITHOUT THE KNOLEDGE OF JOANNE RABOT, AND HER ATTORNEY, CO-CONSPERITORS, ATTORNEY ERICA FOSTER ALSO WAS JUST PLAIN SHOD IN HER PERSUIT TO COMPLEAT HER JOB, AND BY HER ACTIONS ALLOWED THIS FRAUD TO CONTINUE TO THIS DATE.

BOTH ATTORNEY'S KNEW FULL WELL THAT NO ALLEGED COLLECTION OF ARREARS CAN BE POSSIABLE UNTILL A STILL TO BE HEARD REMAND ISSUED BY THE MASS. STATE APPEALS COURT IS COMPLEATED(EXHIBIT #5), AND THE ISSUE OF CHILD SUPPORT SPLITTING IS HEARD, BOTH ISSUES ARE AGAINST THE ALLEGED \$22,700. DOLLER ARREARS.

THE PLAINTIFF DEMANDS PUNITIVE DAMAGES OF \$500,000.00 AGAINST THE TEXAS CHILD SUPPORT AGENCY OF THE ATTORNEY GENERAL FOR COMPLICITY TO FRAUD, EXTORTION, AND BLACKMAIL USEING THE U.S.MAIL.

THE PLAINTIFF DEMANDS PUNITIVE DAMAGES OF \$500,000.00 AGAINST THE CSE CHILD SUPPORT ENFORCEMENT CO. OF AUSTIN TEXAS FOR FRAUD, EXTORTION, BLACKMAIL, AND USEING THE U.S. MAIL, AND INTERSTATE TELEPHONE COMMUNACATIONS TO PERPETRATE THE CRIME, AND BECAUSE THEY HAD NO LEGAL STANDING IN THE CASE WHATEVER TO DEMAND PAYMENT OF ANY MONEY'S WITHOUT A COURT ORDER FROM THE ORIGINAL STATE OF THE CASE WHICH IS MASSACHUSETTS.

THE AWARD FOR DAMAGES IS JUST, THE PLAINTIFF IS A RECOVERING ALCOHOLIC BROUGHT ON BY THE BITTERNESS OF THIS CASE SINCE 1994, AFTER THE SIGNING OF THAT AGREEMENT(EXHIBITS #1 THRU #4), THE PLAINTIFF BELIEVED THAT THE CASE WAS OVER, WHICH HE ALSO BELIEVED THIS ACTION TOOK AWAY A TRIGGER THAT BEGAN DRINKING BINGES THEREBY BRINGING HOPE OF PERMINENT SOBRIATY.

THE PLAINTIFF REQUESTS A JURY TRIAL.

RESPECTFULLY,



PHILLIP A. DAVIDSON PRO SE
42 BECKFORD ST. APT. #4
BEVERLY MASS. 01915
TEL. 978-869-4228

Commonwealth of Massachusetts

The Trial Court

Probate and Family Court Department

Docket No. 90D-1397-D1

ESSEX Division

Judgment AFTER REVIEW

JOANNE RABOT, Plaintiff

v.

PHILLIP DAVIDSON, Defendant

This action came on for (X) (hearing) before the Court, EDWARD J. ROCKETT, Justice presiding, and the issues having been duly (tried) (heard) and findings having been duly rendered.

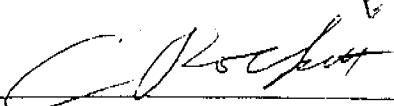
It is Ordered and Adjudged

The signed stipulation of the parties filed September 28, 2001, is incorporated in and made part of this Judgment and the parties shall comply with the terms thereof.

All until further order of the Court.

100Z 70 L70
EXHIBIT #1

Date September 28, 2001


Justice of the Probate and Family Court

I, JoAnne Rabot

, no longer want DOR to collect and enforce child support on my behalf because:

- I reconciled with the noncustodial parent; or
- No more child support is due me because:
 - my children are over age 18, or emancipated, and not dependent on me for support;
 - my children are under age 18 but no longer live with me.
- I prefer to have child support payments paid to me directly instead of having DOR collect the payments and forward them to me.

Other: Since the father has given up all parental rights to the child, I have waived all present and future child support. Child support arrears are set at \$22,774.06 as of 3/15/01 and are preserved.

Custodial Parent Information:

Name: JoAnne Rabot

Address: _____

Phone: _____

SSN: 058-42-5756

Noncustodial Parent Information:

Name: Phillip Davidson

Address: 202 Broughton Drive

Beverly, MA 01915

Phone: (978)

SSN: 020-54-8382

I understand that I may reapply for services at any time, and that I may be assessed an application fee.

Signature: JoAnne Rabot

Custodial Parent

Date: 9/28/01 as of 3/15/01

I agree that the child support case with DOR shall be closed immediately.

Signature: Phillip Davidson

Non-Custodial Parent

Date: 9/28/01 as of 3/15/01

EXHIBIT A2

ESSEX, ss

COMMONWEALTH OF MASSACHUSETTS

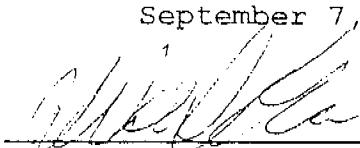
PROBATE AND FAMILY COURT
DOCKET NO.: 90D-1397-D1

)
JOANNE RABOT,
Plaintiff
)
)
vs.
) STIPULATION
)
PHILLIP DAVIDSON,
Defendant
)
)

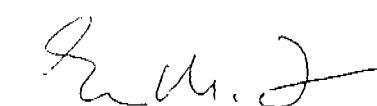
Joanne Rabot and Phillip Davidson hereby agree to the following:

1. Phillip Davidson hereby agrees to relinquish all parental rights he has or may have regarding Kristina Ann Rabot-Davidson, date of birth May 4, 1990.
2. Phillip Davidson will no longer be required to pay child support, provide health insurance or contribute in any other way financially to the support of the minor child.
3. Joanne Rabot hereby agrees to waive all present and future child support owed;
4. Joanne Rabot and Phillip Davidson agree that the past child support owed as of March 15, 2001 in the amount of \$22,774.06 is hereby preserved. Joanne Rabot agrees that she will opt out of services as provided by the Department of Revenue.
5. Unless herein modified, all prior orders of the Court remain in full force and effect.

DATED: March 15, 2001 as of
September 7, 2001



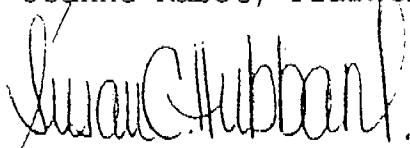
Phillip Davidson, Defendant



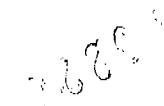
Erica M. Foster, Attorney
for Phillip Davidson



Joanne Rabot, Plaintiff



Susan C. Hubbard, Attorney
for Joanne Rabot

EXHIBIT #3


HUBBARD & EVANS, P.A.

430 Boston Street
Suite 105
Topsfield, MA 01983

Susan C. Hubbard
Andrew W. Evans

Telephone (978) 887-1075
Telecopier (978) 887-1076

October 29, 2001

Erica M. Foster, Attorney
100 Hathorne Office Park
491 Maple Street
Danvers, MA 01923

RE: Rabot vs. Davidson

Dear Erica:

As per our Stipulation, my client, JoAnne Rabot is requesting that the DOR collection case be terminated.

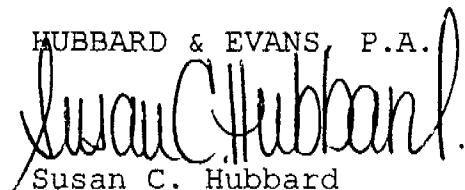
To that end, Phillip must also sign the termination form. I am sorry that I did not realize while we were at Court that Phillip needed to sign same. Please have him sign on the bottom and forward the form back to me. I will complete JoAnne's address and file the form with DOR.

If you have any questions or comments, please do not hesitate to contact me.

Thanking you, I am

Very truly yours,

HUBBARD & EVANS, P.A.



Susan C. Hubbard

SCH/jah
Enclosure

EXHIBIT #4

NOV 01 2001

COMMONWEALTH OF MASSACHUSETTS
THE TRIAL COURT
THE PROBATE AND FAMILY COURT DEPARTMENT

ESSEX DIVISION

DOCKET NO. 90D1397D1

Joanne Rabot
Plaintiff
v.
Phillip A. Davidson
Defendant

JUDGMENT AFTER RESCRIPT

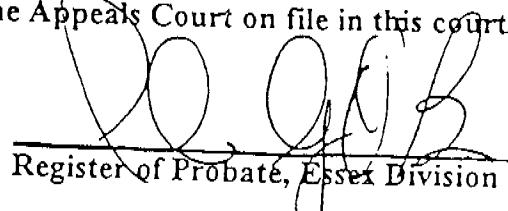
At the Probate and Family Court held at Salem in and for said County of Essex, on the twenty-eighth day of August, 1997;

Whereas on appeal to the Appeals Court for the Commonwealth of Massachusetts dated August 7, 1995;

It appears that a rescript from the Appeals Court for the Commonwealth dated May 16, 1997 was filed in this Court on June 13, 1997 whereby it was ordered that the following entry be made in the docket of this Court:

"The case is remanded to the Probate and Family Court so that the defendant may have a further opportunity to make an evidentiary showing with respect to the arrearage calculation of August 7, 1995. In all other respects, the judgment and order of August 7, 1995, are affirmed."

The Court hereby orders and adjudges that the case be remanded to the court for further proceedings consistent with the opinion of the Appeals Court on file in this court.


Register of Probate, Essex Division

(EXHIBIT #5

CSE

CHILD SUPPORT ENFORCEMENT

April 23, 2002

Phillip Anthony Davidson
PO Box 4405
Peabody, MA 01961

Re: Delinquent Child Support for "Joanne Rabot"

Case No: 195622

Respond by Payment to Be Received Prior to May 14, 2002

Minimum Payment Due: \$260.00

Dear Phillip Anthony Davidson,

You have discontinued paying child support, **in willful disobedience of the court's order**. You have also refused to contact us to make arrangements to bring yourself into compliance with the order.

If you wish to avoid court-ordered enforcement, it is **required** that you do the following:

1. **Immediately make a child support payment in the amount specified;**
2. Contact us to discuss arrangements for additional payments, or to make other special arrangements.

Unless payment is received in this office on or before **5:00 o'clock p.m., on May 14, 2002**, or other acceptable arrangements are made, we will immediately refer this matter to our attorneys for the commencement of enforcement proceedings. If enforcement proceedings are commenced, you may be required to pay not only the child support due, but also interest thereon, attorney's fees and costs of court.

Your payment must be mailed, immediately, to your local child support agency or:

CSE Child Support Enforcement, CO.
P.O. Box 49459
Austin, Texas 78765.

If payment is not received in accordance herewith, this matter will be referred to our attorneys, without further notice to you.

Very truly yours,

Ginny Stoner
Enforcement Specialist, CSE
866-541-3107

CSE CHILD SUPPORT ENFORCEMENT P.O. Box 49459 AUSTIN, TX 78765

EXHIBIT #6

[WHAT'S NEW!!](#)[SEARCH](#)[CONTACT](#)[Supervised Institutions](#)[Consumer Info & Complaints](#)[Request Public Information](#)[Employment](#)[Press Releases,
Speeches, Testimonies](#)[Publications](#)[Application Forms -
Supervised Entities](#)[The Ombudsman](#)

Registered Offices of Private Child Support Enforcement Agencies

Reg. No.*	Legal Name Including d/b/a and assumed names	Address	Effective	Expiration
1	Supportkids, Inc., d/b/a CSE Child Support Enforcement Agency	4120 Freidrich Lane, Ste. 175, Austin, TX	2/14/2002	2/14/2005
2	Support the Children, Inc.	5202 Springlake, Garland, TX	2/15/2002	2/15/2005
3	M. J. (Mike) Human d/b/a Human Interest Agency	6301 Gaston Avenue, Ste. 800, Dallas, TX	2/19/2002	2/19/2005
4	Child Support Assistance Network, Inc.	1103 Romaine, Houston, TX	2/20/2002	2/20/2005
5	Kids Income Depends on Support, Ltd., d/b/a K.I.D.S., Ltd. and d/b/a KIDS, Ltd.	3201 Cherry Ridge, Ste. 300 San Antonio, TX	2/27/2002	2/27/2005
6	Child Support Specialist, Inc., d/b/a Child Support Specialists	2500 Wilcrest No. 300 Houston, Texas	2/27/2002	2/27/2005
7	Child Support Network, Inc.	212 E. Osborn Road, Ste. 210, Phoenix, Arizona	2/27/2002	2/27/2005
8	Bureau of Child Support Enforcement, LLC, d/b/a BCSE	3939 E. Hwy. 80, Ste. 400, Mesquite, TX	3/01/2002	3/01/2005
9	Enforce-It!, LLC, d/b/a Guardian Child Support; Guardian Child Support Enforcement; Guardian Child Support Enforcement Systems; and Guardian The Child Support People	14121 NW Frwy., Ste. B Houston, TX	3/01/2002	3/01/2005
10	Child Support Bureau of Texas, LLC, d/b/a CSBT and d/b/a CSBT, LLC	1734 E. Quinlan Parkway, Quinlan, TX	3/01/2002	3/01/2005
11	Jack R. Taylor d/b/a Kids Support Enforcement Agency	2201 Midway Road, #108 Carrollton, TX	4/08/2002	4/08/2005
T3b	Innovative Collection Concepts, Inc., d/b/a National Child Support Center d/b/a National Child Support	11260 Cornell Park Dr., Ste. 706, Cincinnati, OH	5/02/2002	7/01/2002

* Registration numbers prefixed with a "T" denote a temporary certificate.

EXHIBIT #7

Contact Information

Child Care Subsidy Agency

Texas Workforce Commission
101 East 15th Street Suite 434T
Austin, TX 78778-0001
Phone: 512-936-3141
Fax: 512-936-3223
<http://www.twc.state.tx.us/svcs/childcare/ccinfo.html>

Head Start - State Collaboration Office

Texas Head Start - State Collaboration Office
Office of the Governor
P.O. Box 12428
Austin, TX 78711
Phone: 512-936-4059
Fax: 512-463-7392
Web site:
http://www.governor.state.tx.us/the_office/head

Child Care Licensing Agency

Department of Protective and Regulatory Services
Child Care Licensing
P.O. Box 149030
M.C. E-550
Austin, TX 78714-9030
Phone: Day Care Hotline: 800-862-5252
or 512-438-3267
Fax: 512-438-3848
Web site: http://www.tdprs.state.tx.us/Child_Care/

State Child Care Resource & Referral Co

Texas Association of Child Care Resource & Re
Agencies
230 Pereida
San Antonio, TX 78210
Phone: 210-226-3391
Fax: 210-226-0108

Child Care Food Program Agency

Texas Department of Human Services
Attn.: State Director, Client Self-Support Services
1106 Clayton Lane, Suite 217E
P.O. Box 149030
Austin, TX 78714-9030
Phone: 512-483-3941
Fax: 512-467-5855
Web site:
<http://www.dhs.state.tx.us/programs/snp/index.html>

Office of Child Support Enforcement

Texas Office of the Attorney General
Child Support Division
P.O. Box 12017
Austin, TX 78711-2017
Phone: 512-460-6000
Fax: 512-460-6028

Child Abuse Reporting

To report suspected child abuse in Texas, call (800) 252-5400.

For national child abuse information, call the Childhelp USA National Child Abuse Hotline (staffed 24 hours daily with professional crisis counselors): 1-800-4-A-CHILD or 1-800-2-A-CHILD (T.D.D)

EXHIBIT #7

PHILLIP A. DAVIDSON
42 BECKFORD ST. APT. #4
BEVERLY MASS. 01915

MAY 6, 2002

ATTORNEY ERICA M. FOSTER

AND

SUSAN C. HUBBARD P.A.

DEAR ATTORNEY'S, I AM SENDING YOU THE LATEST HARASSMENT DEMAND BY THE TEXAS D.O.R. IN WHICH I AM VERY UNHAPPY TO RECIEVE, I TOLD YOU ATTORNEY FOSTER A FEW WEEKS BACK "ENOUGH, WAS ENOUGH, AND I WOULD NOT TAKE ANYMORE, SO WITH THAT STATEMENT IN MIND I STATE THE FOLLOWING DEMAND,: THE TEXAS D.O.R. HAS NEVER HAD ANY JURISDICTION IN THIS CASE EXCEPT AS A MAIL DROP, THEREFORE I DEMAND BOTH END THIS HARASSMENT BY THE 22ND OF MAY 2002 ONCE AND FOR ALL IF THIS IS NOT DONE I WILL TAKE THE FOLLOWING ACTIONS,:

(1) I WILL FILE A CRIMINAL FEDERAL ACTION HOLDING BOTH OF YOU ACCOUNTABLE FOR THE FRAUD, AND EXTORTION THAT IS NOW BEING HEAPED UPON ME BY JOANNE RABOT, THE TEXAS D.O.R.FOR NOT DOING YOUR JOBS.

(2) I HOLD JOANN RABOT ACCOUNTABLE FOR FRAUD, AND EXTORTION FOR THE PERPATRATION OF THIS FRAUDULENT ALLEGED SETTLEMENT IN ORDER TO GAIN SOLE CUSTODY OF THE CHILD, MOVE OUT OF STATE, THEN PROCEED TO START OVER WITH CHILD SUPPORT COLLECTIONS, AND ARREARS NOT OWED, AS BOTH OF YOU KNOW, THERE IS A REMAND STILL UNHEARD ON THOSE ARREARS, AS WELL AS A ILLEGAL ISSUE OF THE CHILD SUPPORT SPLITTING WHICH IS A FACTOR IN THAT CASE, THE EVIDENCE OF THE TEXAS D.O.R. HARASSMENT BARES THIS SHAM OUT.

(3) BECAUSE OF BOTH LAWYER'S NON-FEASANCE I WILL ASK THE COURT TO SUSPEND BOTH OF YOUR LICENSES TO PRACTICE LAW IN ANY MANNER FOR SIX MONTHS, AND FURTHER TAKE THE MATTER UP WITH THE BOARD OF OVERSEERS.

(4) I WILL FILE THIS CRIMINAL COMPLAINT AGAINST THE TEXAS DOR ON FRAUD, EXTORTION, AND FRAUD BY U.S. MAIL.

IF THIS ENTIRE MATTER IS NOT SETTLED BY MAY 22, 2002 I WILL PROCEED WITH THE FILEING OF THAT FEDERAL CRIMINAL CASE IN THE FEDERAL DISTRICT COURT IN BOSTON AS SOON AS THE PAPERWORK IS COMPLEATED.

I AM SORRY THAT I HAVE TO TAKE THIS ACTION BUT ENOUGH, IS QUITE ENOUGH.

YOURS TRULY,



The signature is handwritten in black ink, appearing to read "Phillip A. Davidson". It is written in a cursive style with a horizontal line through the end of the signature.

PHILLIP A. DAVIDSON

EXHIBIT #10